

## Internal Audit Office Vendor Master File – July 2013

## **Audit Observation Status Report**

Recommendation	Management Response	Status as of	Fully
	July 2013	December 2014	Implemented
<ul> <li>1.1 A vendor verification process that adds reasonable assurance of the validity of new vendors is fundamental to the integrity of the Vendor Master File. Compensating controls could be implemented where preventative controls are not reasonably accessible. The following detailed procedures could be utilized for new vendor set up and validation:</li> <li>Segregation of duties for employees involved in vendor set up and approval.</li> <li>Verification of vendor through the Corporation Commission (if applicable).</li> <li>Require a W-9 or equivalent prior to set-up.</li> <li>Require a physical address for those providing only a PO Box.</li> </ul>	<ul> <li>1.1 Management of the Finance &amp; Technology         Department concurs with the following         recommendations (and related observations)         unless otherwise noted below. Follow up         responsibility (position title) and estimated         completion dates follow each bullet-pointed         response below.</li> <li>✓ Management will review current segregation         of duties and make improvements where         possible given current resources. We believe         that, currently, appropriate control is         substantially achieved through the         segregation of vendor approval from         voucher entry. (Those with vendor         Approval authority do not have the ability to         enter vouchers.)</li> <li>Responsible Party:         Deputy Finance &amp; Technology Director     </li> <li>Implementation Date:         January 2014</li> <li>✓ A good portion of our vendors are         determined to be valid based on the fact that</li> </ul>	<ul> <li>Management believes the validation of new vendors and proper segregation of duties has been achieved through the following procedures:</li> <li>1. A W-9 is required for all new vendors (except payments relating to rebates, reimbursements, registrations, renewals, or refunds) [see IRS Form 1099-Misc Procedures page 8]</li> <li>2. Segregation of the ability for an individual to ENTER a vendor from the ability to APPROVE a vendor [see IRS Form 1099-Misc Procedures page 4]</li> <li>3. Segregation of the ability to APPROVE a vendor from the ability to change vendor NAME 1 System [see IRS Form 1099-Misc Procedures page 8]</li> <li>4. Validation of the Vendor Name and TIN number through the IRS TIN Verification System [see IRS Form 1099-Misc Procedures page 33]</li> </ul>	Yes

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<ul> <li>✓ Validate vendors address and phone number (e.g. Corporation Commission, Google, online Phone directory, Better Business Bureau, Contractor License, etc.). Document and maintain where information was gathered to validate the vendor.</li> <li>✓ Check vendors against the Federal Bureau of Industry and Security's list of excluded persons or companies.</li> <li>✓ Research alternative ways of validating Tax Identification Numbers (TIN) on the IRS website without having to provide personal information.</li> <li>✓ Consider establishing a new vendor set up form maintained electronically or in a hard-copy file that includes:         <ul> <li>Requester and approver of the vendor,</li> <li>A checklist verifying that a W-9 has been received, vendor verification and validation has been completed (including the means used to validate</li> </ul> </li> </ul>	they are required to go through our formal procurement process (vendor registration, public solicitations, reference checks, provision of evidence of certifications, licenses, insurances, etc.). For vendors not subject to this process, management will review what steps realistically can be taken to enhance verification.  Responsible Party: Cash Management Supervisor (AP Supervisor)  Implementation Date: April 2014  Not all vendors are subject to the 1099 reporting requirement (i.e., corporations). For those that are subject to that reporting, we will update our procedures to require the receipt of a W-9 prior to vendor approval. We will explore the pros and cons of requiring a W-9 from all vendors.  Responsible Party: Cash Management Supervisor (AP Supervisor)  Implementation Date: April 2014  Accounting will continue to research ways of validating taxpayer identification numbers (TIN). This validation currently occurs after the 1099's are filed and we receive	5. Requirement of a W-9 is included on the Purchasing Division's Contract File Assembly/Maintenance Checklist  6. Additional review of new vendors occurs at a minimum annually during the 1099 Process [see IRS Form 1099-Misc Procedures pages 11-15].	Implemented

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vendor existence.)	notification from the IRS of an incorrect TIN.	December 2014	Implemented
The above verification procedures could also be performed on random samples of vendors recently added.	Responsible Party: Cash Management Supervisor (AP Supervisor) Implementation Date: April 2014		
Alternatively, management could routinely review an existing PeopleSoft report that lists new vendors recently added for reasonableness including: the name and address of the vendor, who set up the vendor, who approved the vendor set up, and any other information that would warrant further review.	<ul> <li>We will seek to obtain street addresses for all vendors.</li> <li>Responsible Party:         Cash Management Supervisor (AP Supervisor)</li> <li>Implementation Date:         April 2014</li> <li>No electronically-routed vendor set up form exists within PeopleSoft. Management will explore the development and use of a manual form or checklist.</li> <li>Responsible Party:         Cash Management Supervisor (AP Supervisor)</li> <li>Implementation Date:         April 2014</li> <li>Management will develop for periodic review a PeopleSoft query/report that lists all new vendors entered into the system.</li> <li>Responsible Party:</li> </ul>		

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	Cash Management Supervisor (AP Supervisor)  Implementation Date: April 2014		
1.2 Adopted procedures to verify vendors in the set-up process require inclusion in established formal policies and procedures.	1.2 Accounting management will include an appropriate vendor verification process (taking cost/benefit into consideration) in our financial policies and procedures.  Responsible Party: Cash Management Supervisor (AP Supervisor)  Implementation Date: April 2014	Establishing a new vendor procedure has been formally documented as an element of the 1099 Procedures [see IRS Form 1099-Misc Procedures page 8].	Yes
2.1 Finance and IT should work together to assess the situation and determine if system parameters can be changed in the CC&B System to effectively interface with PeopleSoft to comply with established naming conventions.	<ul> <li>2.1 The Customer Service Division will work with our IT Division to determine whether the interface between PeopleSoft Accounts Payable and CC&amp;B can be programmed to comply with established naming conventions in PeopleSoft.</li> <li>Responsible Party: Deputy Finance &amp; Technology Director</li> <li>Implementation Date: January 2014</li> </ul>	Per discussion with IT making such a change would be difficult since 100% of customer names have not been entered into CC&B in a consistent format (last name, first name). Additionally, there is only one field for the name, not a separate field for first and last name. Because of these facts, trying to make the recommended change may do more harm than good. In this case, management believes the potential benefit of making this change does not justify the cost.	No Management Assuming Risk

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3.1 To mitigate risk, Finance could review the VMF at year end to ensure vendors with no activity are purged/inactivated, duplicate vendor records are corrected, and the accuracy of vendor information is adequate and authorized. This review should be performed by management or staff independent of those involved in vendor setup.  Opportunities to enhance the PeopleSoft Financial System's functionality to create "Required Fields" in the process of entering a new vendor could be pursued. System requirements of entry of a complete address and/or Federal Tax ID number (as applicable) prior to the creation of a new vendor could prove beneficial.	3.1 The Finance Division will work with ITD to purge/inactivate unutilized vendors (with no activity for the past 24 months) at each fiscal year-end; will also explore the use of "Required Fields." Duplicate vendor records are currently reviewed and corrected yearly in preparation of issuing 1099s'.  Responsible Party: Controller  Implementation Date: April 2014	Upon further review and discussion between Purchasing and Accounting, it was determined that due to the vendor cycle that the most advantageous time frame is no activity for the past three years.  The recommendation was implemented for inactivity for the past three years. This process will be automated to run monthly.  Regarding required fields for Federal Tax ID numbers, a warning is displayed if the vendor is entered and when it is approved if the Withholding box is checked, but no TIN information is entered. In the event this discrepancy remains, it is then addressed at year end through the 1099 Process. [see IRS Form 1099-Misc Procedures page 5].	Yes

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4.1 Finance should work with IT to develop the PeopleSoft system's capacity to purge/inactivate outdated one-time vendors using predefined criteria to facilitate efficient VMF processing and clean up.  One-time vendors and vendors with refunds should be purged or inactivated once a check is printed.	4.1 The Finance Division will work with our IT Division to explore the possibility of programming PeopleSoft to automatically purge or inactivate one-time vendors from the system after payment. If this change requires significant resources (or causes other problems i.e., check reissuance, restitution payments), we will purge/inactivate unutilized vendors at fiscal year-end.  Responsible Party: Controller	Due to needing to recut checks, especially the ones not cashed, it was determined that inactivating the one-time vendor after one year is the most beneficial. This will give ample time for any stale dated checks to be identified and attempts to contact the payee to recut the check be made.  A manual process has been put in place by the IT Division and a first pass has been completed. The process will be automated through the system and run monthly by the end of June 2015.	Yes
	Implementation Date: April 2014		
5.1 Finance and IT should continue to work together to mitigate the risks associated with the ability to alter vendors. Access controls should be routinely reviewed to ensure that the capacity to change vendor names is restricted to only a few key employees that require this ability.	5.1 Technically, you can't delete vendors, only change their names. We will continue our current practice of limiting the ability to change vendor names in the PeopleSoft system to two Financial Services supervisory employees, who do not have voucher entry or voucher approval authorization.  Management will periodically monitor the system to ensure that only authorized employees have this ability. An audit trail has been established to track any changes made.  Responsible Party: Controller  Implementation Date: April 2014	The individuals system authorized to change NAME 1 do not have the ability to approve vendors [see IRS Form 1099-Misc Procedures page 8+9].  Annually a query is run to verify the individuals with system authority to ENTER vendors are not the same individuals with system authority to APPROVE vendors [see IRS Form 1099-Misc Procedures page 4].	Yes

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5.2 Monthly, as part of the month end close out process, the system report that details the Vendor ID and where the check was sent could be reviewed by someone independent of the employees that process the vouchers to ensure payments are only made to authorized vendors, or have been changed only for legitimate reasons such as IRS tax levies.	5.2 Our current practice is necessary in order to direct payments to the proper party. The process is controlled and authorization is properly limited to selected employees. There is another built-in control – if an invoice is entered and approved and the payment is diverted to another party, the vendor expecting payment will contact the department that initiated the purchase, which would trigger an investigation into the status of the payment request. A diverted payment would be discovered during this process. As an additional check, we will have the AP Supervisor review the system report monthly to ensure that payments were made only to authorized vendors.  Responsible Party: Cash Management Supervisor (AP Supervisor)  Implementation Date: April 2014	Monthly a query "AP_PYMNT_VNDR_ NAME_CMPR" is run to identify any payments in which the check was written to an entity other than the vendor name. This review is included on <i>Month-end Schedule</i> checklist.	Yes

Recommendation  6.1 Authorization to enter vendors could be restricted to as few as two employees with an additional back-up. Employees setting up and adding the new vendors should not be able to approve the vendor. There should be an independent review and approval process.	Management Response July 2013  6.1 Management of the Finance Division will review current vendor creation and approval authorization and recommend changes to enhance appropriate segregation of duties. Segregation of entry and approval might not be necessary if the payment processing function is segregated.  Responsible Party: Deputy Finance & Technology Director  Implementation Date: January 2014	Status as of December 2014  Authorization to ENTER vendors has been separated from the ability to APPROVE vendors. The ability to approve vendors has been restricted to two individuals in Accounting and the four Buyers in Purchasing.	Fully Implemented Yes
6.2 PeopleSoft access should support proper segregation of duties and adequate compensating controls in the form of management review. No employee should be able to complete the entire purchasing process with no independent review.	6.2 We will review all employee access/functions to ensure no single employee has the ability to complete the entire purchasing process through vendor payment without independent review.  Responsible Party: Deputy Finance & Technology Director  Implementation Date: January 2014	Based on the implementation of many of the recommendation throughout this report, management believes that adequate and compensating controls have been implemented.  No employee has the ability to complete the entire process.	Yes
6.3 In order to minimize the workload of the Finance Department, two Divisions (Engineering and Housing) were granted access to enter and approve vendors. Routine monitoring and review of related activities could be	6.3 The Finance Division will work with ITD to develop a query/report that can be run periodically and will reflect any new vendors established by Engineering and Housing.  This report will be reviewed on a monthly basis by the AP Supervisor and/or Controller.	The access to both ENTER and APPROVE vendors has been removed from the Engineering and Housing Divisions. Selected individuals in those areas only have the ability to ENTER vendors.	Yes

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performed by Finance as a compensating control.	Responsible Party: Cash Management Supervisor (AP Supervisor) Implementation Date: April 2014		
7.1 System capabilities should be explored to automatically default access parameters for employees that transfer to basic access levels until such time as a formal request for specific access is received.  Additionally, when access is removed for employees ensure it is removed in both the security role and the function panels.	7.1 Management in the Financial Services Division will work with the IT Division to explore alternatives (i.e., HR employee separation checklist) for appropriately limiting system access for employees who change positions.  Responsible Party: Deputy Finance & Technology Director  Implementation Date: January 2014	The employee separation checklist needs to be updated to include employee transfers and to specifically address changing employee access to various computer systems as is appropriate.  Will work with HR to get the separation checklist updated.  Responsible Party: Deputy Finance & Technology Director  Implementation Date: June 2015	No
8.1 This issue has been corrected by IT; no further action is needed.			N/A
9.1 Ideally, an employee independent of the individual making changes to vendors should approve the changes to ensure the modifications are initiated only by authorized employees and	9.1 This appears to be the same as recommendation 6.1 – segregate the functions of vendor set-up and vendor approval. With limited staff in Financial Services, this recommendation might not offer sufficient improvement to internal controls to justify the use of resources. If we	See response to recommendation 6.1; in addition, if a change is made to the vendor file, the system will automatically set the vendor status back to "unapproved" and the approval process will then need to take place in order to continue to utilize the vendor.	Yes

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the changes are valid and warranted. Should this not prove to be practical given current staffing levels, management could routinely review vendor modifications for reasonableness as a compensating control.	July 2013  limit the number of employees who are able to update the vendor file and segregate that duty from payment processing duties, we will have achieved a high level of duty-segregation to guard against the processing of improper payments.  Responsible Party: Deputy Finance & Technology Director  Implementation Date: January 2014	December 2014	Implemented
10.1 Employees with conflicts of interest should immediately file a COI disclosure form with the Procurement Office.	10.1 Management of the Finance Division agrees with your statement. Procurement recently began providing a "Procurement 101" course in which employee responsibility to file a COI is covered as part of the ethics section. This training is not mandatory, but provided upon request or determination of need by the Procurement Office. This information is also posted on the Procurement intranet. Additionally, during each public solicitation process, employee participants are advised of COI requirements.  Responsible Party: Central Services Manager  Implementation Date: Ongoing	Procurement continues to communicate the COI disclosure requirements and in addition to the instances noted, we are also now discussing this issue as part of the City's Supervisor's Academy training class which is taught at various times throughout the year. Procurement will begin formal (scheduled) Procurement 101 trainings on a monthly basis beginning this April.  Responsible Party: Central Services Manager  Implementation Date: April 2015	Yes

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10.2 Supervisors in areas purchasing goods from vendors with identified conflicts should be monitoring purchases from these vendors to ensure that the employee with the conflict is not influencing or involved in the purchasing decision. Mechanisms should be put into place to ensure that supervisors are aware of identified conflicts.	10.2 Procurement recently began providing a "Procurement 101" course in which employee responsibility to file a COI is covered as part of the ethics section.  Included in the course is information regarding the employee's (with a conflict) inability to participate in the purchasing decision. Additionally, Procurement will begin providing a copy of the submitted COI form to the employee's supervisor.  Responsible Party: Central Services Manager  Implementation Date: Ongoing	Procurement has implemented this additional step to make sure the employee's supervisor is aware of any disclosed conflicts of interests filed.	Yes
11.1 Finance should work with IT to determine the cause for utilities being included and resolve this problem. Additionally, duplicate vendor numbers need to be inactivated to reduce the risk of incorrectly reporting tax withholdings.	11.1 The Finance Division will work with the IT Division to determine if the one case of mis-reporting taxable income for a vendor by \$36 was an isolated incident or a system issue. The recommendation regarding inactivating vendor numbers has been covered in recommendation #3.1. We will also explore the development of a query/report to more timely identify duplicate vendor numbers. Responsible Party: Controller Implementation Date: April 2014	In certain cases, duplicate vendor numbers are a necessity. Duplicate vendor numbers are reviewed annually through the 1099 Process. Any vendors identified through the process that are incorrectly established as a duplicate vendor is corrected. [see IRS Form 1099-Misc Procedures page 20].  Please note, this specific example was an isolated incident. In addition, an entity is not penalized should a non-reportable item be included on the form 1099.	Yes

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12.1 Procurement should continue to provide COI training to as many employees as possible. Refresher courses could also be offered periodically.	12.1 See response to 10.1 & 10.2. The Procurement Office will continue to provide procurement training to employees in City departments as requested or as determined necessary by Procurement. Additionally, we explore the inclusion of COI rules as part of the ethics training provided to new employees.  Responsible Party: Central Services Manager  Implementation Date: Ongoing	Procurement continues to communicate the COI disclosure requirements and in addition to the instances noted, we are also now discussing this issue as part of the City's Supervisor's Academy training class which is taught at various times throughout the year. Procurement will begin formal (scheduled) Procurement 101 trainings on a monthly basis beginning this April in which Conflict of Interest issues will be discussed in detail.  Responsible Party: Central Services Manager  Implementation Date: April 2015	Yes
12.2 Procurement should communicate information related to COI laws and disclosure requirements and related City policy citywide through various possible means such as posts to City Information and/or newsletters with periodic annual reminders to employees.	12.2 See response to 10.1 & 10.2. The Procurement Office will continue to include conflict of interest laws and rules in the training provided to employees in City departments. This information is currently provided on the Procurement intranet. Procurement will at least annually send out email and/or newsletter reminders regarding COI rules.  Responsible Party: Central Services Manager  Implementation Date: January 2014	Procurement plans to issue its first newsletter this April and will ensure that the issues of COI will be included in that publication. In addition, monthly scheduled Procurement 101 classes will begin effective this coming April 2015 where COI issues will be discussed.  Responsible Party: Central Services Manager  Implementation Date: April 2015	Yes

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12.3 Procurement should formalize conflict of interest laws and requirements into written policies and procedures.	12.3 The Procurement Office will ensure that the City's Procurement Code and/or Procurement Policies/Procedures include updated language regarding conflict of interest laws and rules.  Responsible Party: Central Services Manager  Implementation Date: January 2014	The Procurement Division has developed language regarding conflict of interest disclosure requirements that pertain to employees of the City. This language will be included in the next update planned for City's Procurement Manual which is currently under review and will be finalized and published to our intranet by the end of February of this year.  Responsible Party: Central Services Manager  Implementation Date: February 2015	Yes
13.1 Procurement should work with IT to develop a method in PeopleSoft to flag vendors with known conflicts. Payments should not be allowed to these vendors until the required quotes are obtained and reviewed by the Procurement Officer.	<ul> <li>Management of the Finance Division will work with our IT Division to determine if it is possible and practical to program an alert in PeopleSoft when vendors have been identified as having a conflict of interest.</li> <li>Responsible Party:         <ul> <li>Central Services</li> <li>Manager</li> </ul> </li> <li>Implementation Date:         <ul> <li>April 2014</li> </ul> </li> </ul>	Procurement has not yet been able to determine if this type of alert is possible and will make this determination by end of April of 2015.  Responsible Party: Central Services Manager  Implementation Date: April 2015	No
14.1 The AP Desktop procedures should address departmental responsibilities of	14.1 The Financial Services Division will ensure that Accounts Payable Procedures clearly state departments' responsibilities for taking delivery of purchased equipment	As the AP Desktop procedures are not reviewed by the departments, a more effective way of communicating the department's responsibility would be through	Yes

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performing a three-way match evidenced by approval for payment as well as maintenance of supporting documentation (invoices, receiving documentation, packing slips, etc.) for all purchases of goods and services. Confirmation of departmental responsibilities should be effectively communicated citywide.	and maintaining proper documentation.  Responsible Party: Cash Management Supervisor (AP Supervisor)  Implementation Date: April 2014	an e-mail communication. Annually in January an e-mail will be sent out reminding department's responsibilities regarding receipt and payment of goods and services.	
14.2 Transfers of assets to third parties should not be made prior to signed agreements and acceptance of responsibility for the property. The feasibility of a system to detect these types of purchases warrants research.	14.2 Response from Fire Department: Concur with observation. Due to the size of the assets (mobile command centers) it was determined to be more efficient to have the asset delivered to the City of Glendale. Rather than take delivery at the City of Tempe and then ship to the City of Glendale. Generally, all equipment is delivered to the City of Tempe. Further, both the City of Glendale and City of Tempe had turnover in key positions which were in charge of processing and tracking the IGA. At the City of Tempe, turnover included the Fire Chief, the Assistant Chief and the Deputy Chief involved with this process. Lastly, the City of Glendale had no Council meeting in July to adopt/sign the IGA.  The City Attorney assigned to the Fire	Assistant Chief Tom Abbott and Assistant City Attorney Kara Stanek met" with and representatives from many other city fire departments to create an IGA. The committee included members from Phoenix and Glendale. The idea was we would draft an IGA that documented the joint relationship of the Fire departments' All Hazards Incident Management Teams and have the respective City Council's approve it once and then each time a new grant was received, we would not need to do a new IGA, but would just do a smaller document between the respective Fire Chiefs document what equipment was going where pursuant to a new grant. After numerous meetings in early 2014 and a draft proposed by me to the group, the issue lost favor. Tom Abbott retired and the group disbanded."-Kara Stanek, City Attorney. Since Assistant Chief Tom	No

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	Department has suggested a holistic IGA which would encompass all future pass through grants purchases and the subsequent distribution of equipment to streamline the process. This IGA would be in accordance with ARS 11-951-through 11-954.  Responsible Party: Fire Budget/Finance Supervisor and Assistant Fire Chief Implementation Date: May 2014	Abbott's retirement, Tempe Fire Medical Rescue (TFMR) has not submitted for any grants that would involve transfer of assets to other cities.  Since a holistic IGA to encompass all future pass through grants purchases and the subsequent distribution of equipment does not appear to be feasible, Assistant Chief Paul Nies has been assigned to work on developing an internal grant management policy. This policy would include an outline of the process to transfer assets to other cities in accordance with ARS 11-951-through 11-954. We would request guidance from Internal Audit to assistant in the development of the grant management policy.  Responsible Party:  Assistant Fire Chief Paul Nies and Fire Budget/Finance Supervisor Debbie Bair  Implementation Date:  June 2015	
15.1 We encourage Finance to work on addressing identified policy deficiencies and pursue updating, finalizing and approving their draft policies and procedures. Management should consider obtaining feedback from employees and departments on any	15.1 The Finance Division will complete the update of its Accounts Payable Desktop Procedures by June 2014 and take steps to communicate related policies to employees as applicable.  Responsible Party: Cash Management Supervisor (AP Supervisor)	In 2014, procedures were documented for IRS <i>Form 1099-Misc</i> . These procedures address, in writing, several of the audit recommendations. Accounting believes these procedures are a better reference tool, in regards to the Vendor Master File, than the Desktop Procedures. Accounting also has policies relating to items other than the Vendor Master File, which can be found in the following locations:	Yes

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specific directives or	Implementation Date:	Accounting's website (for City-wide)	
requirements that need	June 2014	procedures)	
clarification or inclusion.		<ul> <li>Accounts Payable Policy and Procedure</li> </ul>	
The policy should also		folder (for internal policies and	
include consequences for		procedures).	
non-adherence. The policies			
and procedures should be		Accounting endeavors to continually review	
clearly communicated to		processes and update policies and procedures	
employees across the City.		as needed.	
They should also be			
evaluated for effectiveness			
and revision requirements			
on a continuous basis.			